



C O V E R

S H E E T

FAX

**To:** Jaimie Driskill, Environmental Technical Specialist, Qualex, Inc.  
**Fax #:** 919-484-3746 Phone-919-484-3605  
**Subject:** Photoprocessing chemical disposal to the Springfield, Mo. POTW from a One-Hour Photo Lab inside the local Target Store at 1825 E. Primrose  
**Date:** February 9, 1998  
**Pages:** 1, including this cover sheet.

COMMENTS: I have reviewed the information that you faxed to us earlier regarding photographic processing wastewater disposal to the Springfield, Mo. POTW. As discussed, all process wastewater must comply with Chapter 30 of the Springfield City Code, Wastewater Regulations. The Springfield POTW does not have a specific local discharge limitation for silver at this time. Assessment of the need to adjust or evaluate local discharge limitations is an ongoing process, however. Your information indicates that a lab processing 30 rolls of film per day would generate approximately 2.7 gallons of used solutions. Only 1.9 gallons would contain silver. The silver-bearing solutions will be treated with a silver recovery unit utilizing two metallic replacement cartridges in series. Ongoing operation, maintenance, and monitoring of the silver recovery system is required to maintain optimum performance-based removal efficiency. Based on this information, a Wastewater Contribution Permit will not be required by the Springfield POTW at this time.

Although local wastewater regulations do not currently have a local discharge limitation for silver, we strongly encourage the regulated community to comply with the following protocol. As we discussed, the Silver Council, the Association of Metropolitan Sewerage Agencies (AMSA), the National Association of Photographic Manufacturers, the Photo Marketing Association International, and several national and international corporations prepared and issued recommendations on technology, equipment and management practices for controlling silver discharges from facilities that process photographic materials. These recommendations are known as the **Code of Management Practice (CMP)**, and was used to develop a consensus among the regulated and regulatory communities for controlling silver discharges in a cost-effective and environmentally sound manner. Implementation of the CMP recommendations results in many benefits, including improved selection, operation, maintenance and monitoring of silver recovery and management systems among all types and sizes of photographic processing facilities; an increase in the amount of silver recycled and reused; and a reduction in the amount of silver discharged to sewage treatment plants and the environment.

A copy of the **CMP** may be obtained from the National Association of Photographic Manufacturers, Inc, 550 Mamaronck Avenue, Suite 307, Harrison, NY 10528-1612 or (914) 698-7603 Phone  
(914) 698-7609 Fax

From the desk of...

J. Randall Lyman, R.E.H.S.  
Pretreatment Coordinator  
City of Springfield, Mo.  
1216 W. Nichols St.  
Springfield, Mo. 65802

417-864-1487  
Fax: 417-864-1918

1825 E. PRIMROSE